

EXHIBIT O

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA EMAIL

June 8, 2017

Steve Cottreau, Esq.
Katie Barlow, Esq.
Clifford Chance US LLP
2001 K Street, N.W.
Washington, D.C. 20006-1001

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Steve and Katie:

I write on behalf of plaintiffs as a follow up to my June 2, 2007 letter addressing plaintiffs' search term list and the remaining names at issue.

With respect to the category of 35 names discussed in the June 2 letter, plaintiffs have in good faith conducted a careful examination of those names and will agree to a final narrowing of that list by removing another 6 individuals and entities which are identified in Attachment A. In the spirit of compromise, plaintiffs have to date removed 121 individuals and entities (and any associated aliases) from their original list of 500 produced to DIB on October 10, 2016.

Further, after conducting a comprehensive review of the remaining names at issue and the relevant evidence, plaintiffs submit that a modest clarification and two modest revisions are necessary to finalizing the list. First, plaintiffs wish to clarify their understanding and expectation that DIB will produce information relating to any "hits" that contain the names or aliases of the individuals or organizations included in the list. For instance, DIB has agreed to search its electronic database for accounts relating to Saeed Ahmed Lootah (#378 in Plaintiffs' Amended Tranche No. 2). Plaintiffs expect that DIB will produce information regarding any hits for companies or entities that include Mr. Lootah's name, in full or in part, such as Saeed Ahmed Lootah Trading, Saeed Ahmed Lootah General Trading, Saeed & Sultan Lootah Construction Co., and S.S. Lootah Group.

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Second, plaintiffs also propose including two additional names to the list of 500. The first is Abd al Latif Al Imran, owner of Union Beverage Company (a/k/a Union Beverage Factory). As detailed in my June 2 letter, Union Beverage Company was used to funnel significant sums of money to the al Qaeda network. The second is Sheikh Mohamed bin Saqar. According to the German government, on multiple occasions Sheikh Saqar authorized the transfer of funds from his account at DIB to the Third World Relief Agency's bank account in Vienna, Austria. *See* Expert Report of the Federal Office of Criminal Investigation relating to the judicial assistance request, ref. no. INV/10289/T09-PH(245), dated 8/27/2002 of the "Office of the Prosecutor" (OTP) of the International Court of Criminal Justice for the former Yugoslavia relating to the "Third World Relief Agency" (TWRA), Vienna/Austria, pp. 19, 20, and 57. The 9/11 Commission concluded that Osama bin Laden used the TWRA to "covertly provide financial and other support for terrorist activities." *See* 9/11 Report at p. 58.

Finally, plaintiffs agree with your proposal concerning an extension of the discovery production deadline for DIB to the end of July. Please share your draft request to the Court at your earliest convenience.

Sincerely,

COZEN O'CONNOR


By: J. Scott Tarbutton

cc: Members of Plaintiffs' Executive Committees

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ATTACHMENT A

Dafo Trading Co.

Dan Fodio

Dan Trading & Investment Co. Ltd.

Dan Shipping Co.

Ellana Company Ltd.

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